

Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,	)
	) NO. 2:20-cr-00146-JCC
Plaintiff,	)
v.	) UNOPPOSED MOTION FOR ORDER
	) APPOINTING COORDINATING
(1) JESUS DANIEL LERMA-JARAS and	) DISCOVERY ATTORNEY
(2) LIONEL GONZALEZ-TORRES,	)
	)
Defendants.	)

**Motion**

COMES NOW Defendant, Jesus Daniel Lerma-Jaras, through his counsel of record Peter Mazzone individually and to benefit all court-appointed counsel and their defendants and moves this Court for an order under 18 U.S.C. § 3006A(b) appointing Russell M. Aoki as Coordinating Discovery Attorney (“CDA”). Mr. Aoki is one of five national Coordinating Discovery Attorneys under contract with the Administrative Office of the U.S. Courts, Defender Services Office. His role is to implement discovery management strategies that will increase the efficiency of review. Mr. Aoki has already been appointed on the related case of *U.S. v. Gonzalo Villasenor et al.* 2:20-cr-00137-JCC. The work he performs for the *Villasenor* matter can be shared with defense counsel for this matter.

UNOPPOSED MOTION FOR ORDER  
APPOINTING COORDINATING  
DISCOVERY ATTORNEY - 1

MAZZONE LAW FIRM, PLLC  
3002 COLBY AVENUE, STE 302  
EVERETT, WA 98201

1 The Government does not object.

2 **Basis for Motion to Appoint a CDA**

3 Two defendants are charged with conspiracy to possess with intent to distribute  
4 controlled substances and related offenses. The discovery is substantial and is anticipated to  
5 include thousands of pages of documents, thousands of wiretap interceptions from multiple  
6 cell phones, pen register data, photos, and surveillance videos. The discovery is related to  
7 this matter, *U.S. v. Gonzalo Villasenor et al.* 2:20-cr-00137-JCC, and *U.S. v. Laura*  
8 *Rodriguez-Moreno et al.* 2:20-cr-00136-JCC.  
9

10 The large volume of discovery led counsel to seek the assistance of Mr. Aoki as a  
11 Coordinating Discovery Attorney. His role would be that of a consultant. He will advise  
12 counsel of the most efficient way to manage the discovery common to all defendants and  
13 implement a discovery management plan. His work will avoid duplicative time and costs  
14 organizing and searching key documents.  
15

16 The Administrative Office of the U.S. Courts, Defender Services Office (DSO) funds  
17 a program to assist Criminal Justice Act Panel attorneys and Assistant Federal Public  
18 Defenders in matters involving voluminous electronic discovery. Under this program, DSO  
19 pays the fees of an attorney under contract with DSO and appointed by the Court to serve as  
20 Coordinating Discovery Attorney. A Coordinating Discovery Attorney reduces the time and  
21 money expended by appointed counsel in organizing, storing, and reviewing voluminous  
22 discovery in complex matters like this one. Mr. Aoki is under contract with DSO to work as  
23 a Coordinating Discovery Attorney. Although the cost of his time would be paid by DSO,  
24  
25

1 some of his work requires the help of outside litigation support technology companies. For  
2 those services, he will petition this Court for funds.

3 Mr. Aoki has been appointed as a Coordinating Discovery Attorney in over 100  
4 federal cases in 28 federal jurisdictions. Mr. Aoki has experience strategizing how best to  
5 organize multiple types of discovery formats while being mindful of maintaining evidentiary  
6 integrity. He would use this experience to create tools to assist defense counsel in  
7 organizing the voluminous discovery. His work will not include representational services  
8 for any defendant.

9  
10 None of the defense counsel has the same level of experience as Mr. Aoki organizing  
11 voluminous electronic discovery. His work could save substantial time and costs in  
12 assessing and organizing the discovery, as opposed to all defense counsel and their staff  
13 learning about the tools to analyze such a large volume of materials.

14  
15 For all the reasons set forth above, defense counsel respectfully requests this Court  
16 enter an order appointing Russell M. Aoki of Aoki Law PLLC as the Coordinating  
17 Discovery Attorney.  
18

19 Dated this 13<sup>th</sup> day of October, 2020.

20 Respectfully submitted,

21  
22 s/ Peter Mazzone

23 Peter Mazzone WSBA #25262  
24 MAZZONE LAW FIRM PLLC  
25 3002 COLBY AVENUE STE 302  
26 EVERETT, WA 98201 425-259-4989  
27 Email: Peterm@mazzonelaw.com

28 UNOPPOSED MOTION FOR ORDER  
APPOINTING COORDINATING  
DISCOVERY ATTORNEY - 3

MAZZONE LAW FIRM, PLLC  
3002 COLBY AVENUE, STE 302  
EVERETT, WA 98201

CERTIFICATE OF SERVICE

I, Aleshia Johnson, Paralegal at Mazzone Law Firm, PLLC, hereby certify that on this 13<sup>th</sup> day of October, 2020, I electronically filed the foregoing pleading using the CM/ECF system which provides service to all parties including the plaintiff party.

*/s/ Aleshia Johnson*

---

Aleshia Johnson, Paralegal